

# EXHIBIT B

**Ronald G. Harris**

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**From:** Ronald G. Harris  
**Sent:** Thursday, June 6, 2024 2:41 PM  
**To:** Katherine Barrett Riley  
**Cc:** Philip N. Elbert; Olivia R. Arboneaux; Nanci-Taylor Maddux  
**Subject:** RE: Sills v. Southern Baptist Convention et al

Hi Katherine, sorry that you have to deal with this on your vacation. As I overheard Phil Elbert ask you in the phone call, we need additional time to respond on behalf of Jennifer to the outstanding discovery requests. We appreciate you originally granting us an extension until June 7. In my prior request I had asked for a longer extension than June 7, suspecting the time needed due to amount of information we would have to go through and the logistics of doing so. During that prior conversation, you said you would consider additional time if we needed it. Although we have made significant progress, we still need some additional time to complete our response. I understand from listening to your conversation with Phil, that you would not be willing to give us a two-week extension but would consider a 10 day extension for our responses, subject to checking with the other attorneys on your team. Thanks for your consideration.

Thanks..

Ron Harris

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**From:** Katherine Barrett Riley <KB Riley@BarrettLawGroup.com>  
**Sent:** Tuesday, May 21, 2024 6:56 PM  
**To:** Ronald G. Harris <rharris@nealharwell.com>  
**Cc:** Philip N. Elbert <pelbert@nealharwell.com>; Olivia R. Arboneaux <oarboneaux@nealharwell.com>; Nanci-Taylor Maddux <NTMaddux@BarrettLawGroup.com>  
**Subject:** RE: Sills v. Southern Baptist Convention et al

Hi, Ron. This confirms that I have granted an extension until June 7, and I am willing to discuss a further extension for a rolling production of documents after that date. Katherine

*Katherine Barrett Riley*  
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*662-834-2488*  
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**From:** Ronald G. Harris <rharris@nealharwell.com>  
**Sent:** Tuesday, May 21, 2024 6:50 PM  
**To:** Katherine Barrett Riley <KB Riley@BarrettLawGroup.com>  
**Cc:** Philip N. Elbert <pelbert@nealharwell.com>; Olivia R. Arboneaux <oarboneaux@nealharwell.com>  
**Subject:** Sills v. Southern Baptist Convention et al

Katherine, this is to confirm our conversation today that you are willing to give our client Jennifer Lyell an extension, up to and including June 7 to respond to the outstanding discovery requests that the Plaintiffs had propounded to Ms. Lyell. I asked for a longer extension of time given the amount of material that we are going to

have to review. You advised that you had given other defendants an extension until June 7 and wanted to hold that date for now for "house-keeping purposes." This is to confirm that you advised "off the record" that we could revisit that date with you if we needed more time.

Thanks for your cooperation in this matter.

Ron